

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**EUGENIO VARGAS,**

**Plaintiff/Counterclaim  
Defendant,**

**v.**

**ASSOCIATION OF PROFESSIONAL  
FLIGHT ATTENDANTS, *et al.*,**

**Defendants/Counterclaim  
Plaintiff.**

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**Civil Action No. 4:22-cv-430-Y  
Judge Terry R. Means**

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**PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

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Plaintiff Robert “Bob” Ross moves for summary judgment holding Defendants for breach of fiduciary duty, breach of contract, breach of union constitution, violations of his rights to free speech, association, due process, and wrongful discipline under 29 U.S.C. §§ 411 (a)(2), (a)(5), and 529, Intentional Interference with a Contract, and Defamation. The issues arises from a confidential transition agreement entered into by the APFA Board of Directors and Plaintiff, and Defendants’ allegations of a financial misuse of Plaintiff. The matters required by Local Rule 56.3(a) are set forth in the Plaintiff’s supporting brief, and an appendix containing the materials supporting this motion and brief is being filed separately.

Date: January 9, 2024

Respectfully submitted,

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that on January 9, 2024 a true and correct copy of the above was served on Defendants' attorneys, via the e-filing manager.

/S/ Kerri Phillips  
Kerri Phillips

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